

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
PORTIONS OF ITS OFFER OF PROOF
REGARDING DEFENDANTS' TRADE
SECRET MISAPPROPRIATION**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal Portions of Its Offer of Proof Regarding Defendants’ Trade Secret Misappropriation (“Waymo’s
8 Offer of Proof”), filed concurrently herewith (the “Administrative Motion”). The Administrative
9 Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Offer of Proof	Portions to be highlighted tomorrow	Waymo, Defendants, and third party Velodyne

13
14 3. Specifically, certain portions of Waymo’s Offer of Proof contain or refer to trade secret
15 information, which Waymo seeks to seal. Given the sensitivity of this material, Waymo is currently
16 filing the entire document under seal but intends to provide a redacted version tomorrow.

17 4. Certain portions of Waymo’s Offer of Proof contain, reference, and/or describe
18 Waymo’s trade secrets. The information Waymo seeks to seal includes the confidential design and
19 functionality of Waymo’s proprietary autonomous vehicle system, including its LiDAR designs,
20 which Waymo maintains as secret. I understand that these trade secrets are maintained as secret by
21 Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-31). The
22 public disclosure of this information would give Waymo’s competitors access to descriptions of the
23 functionality or features of Waymo’s autonomous vehicle system. If such information were made
24 public, I understand that Waymo’s competitive standing would be significantly harmed.

25 5. Waymo’s request to seal is narrowly tailored to those portions of Waymo’s Offer of
26 Proof that merit sealing.

6. I also understand that Defendants and/or third party Velodyne have designated certain information in Waymo's Offer of Proof as confidential and/or highly confidential under the Protective Order.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on August 24, 2017.

By /s/ *Felipe Corredor*

Felipe Corredor

Attorneys for WAYMO LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Felipe Corredor.

/s/ Charles K. Verhoeven

Charles K. Verhoeven